

FREEDMAN AND LORRY, P.C.
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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| JUNIOUS BLACKWELL | : CIVIL ACTION |
| | : |
| v. | : |
| | : |
| MEADWAY SHIPPING AND | : |
| TRADING, INC. | : NO. |
| | : |
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| | : |

COMPLAINT

Jury Trial Demanded

1. Plaintiff Junious Blackwell is a citizen and resident of the Commonwealth of Pennsylvania.
2. Defendant Meadway Shipping and Trading, Inc., is a business organization organized under under the laws of a country other than the United States with its principal place of business located in 107 Vouliagmenis Avenue, 3rd Floor, 166 74, Athens, Greece.
3. The jurisdiction of this Court is invoked under 28 U.S.C. §1332, there being diversity of citizenship between the parties. The amount in controversy, exclusive of interest and costs, is in excess of Seventy Five Thousand Dollars (\$75,000.00).

4. Venue is appropriate in this Court since a substantial part of the events giving rise to the claim occurred in this judicial district.

5. On or about May 20, 2007, and at all times material hereto, Defendants owned, managed, operated, possessed, controlled and chartered the M/V Fadelsia in foreign commerce.

6. On or about May 20, 2007, the M/V Fadelsia was in navigable waters in the United States and berthed at the Camden Marine Terminal in the Port of Camden, New Jersey.

7. On or about May 20, 2007, and at all times mentioned herein, Plaintiff was employed by Delaware River Stevedores in the capacity of longshoreman and was aboard the M/V Fadelsia as a business visitor in connection with the performance of cargo operations being conducted thereon.

8. On or about May 20, 2007, Plaintiff, while in the course of performing his duties as aforesaid, was caused to sustain serious injuries due to the carelessness and negligence of the Defendant, acting through its agents, servants, workmen and employees.

9. By reason of the carelessness and negligence of the Defendant as aforesaid, the Plaintiff was caused to sustain serious injuries to his left knee and leg, the full extent of which has not yet been determined, he sustained severe injuries to his left shoulder, the full extent of which has not yet been determined, he sustained severe injuries to his lumbosacral spine, the full extent of which has not yet been determined, he sustained other orthopedic, neurological and internal injuries; he sustained severe shock and injury to his nerves and nervous system; he has in the past required and may in the future continue to require medicines, medical care and attention; he has in the past been and may in the future be compelled to expend monies and incur obligations for such care and attention; he has in the past suffered and may in the future continue to suffer agonizing aches, pains and mental anguish; he has in the past been and may in the future continue to be disabled from performing his usual duties, occupations and avocations.

WHEREFORE, Plaintiff Junious Blackwell claims damages of the Defendant in a sum in excess of Seventy Five Thousand Dollars (\$75,000.00), together with pre-judgment interest and costs and brings this action to recover same.

FREEDMAN AND LORRY, P.C.

BY: /S/
STANLEY B. GRUBER
Attorneys for Plaintiff
Junious Blackwell